

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IN RE: REVIEW OF ELECTRIC INTERCONNECTION OF DISTRIBUTED GENERATION FACILITIES RULES [199 IAC CHAPTER 45]	DOCKET NO. RMU-2016-0003
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STATEMENT OF POSITION

The Office of Consumer Advocate (“OCA”), a division of the Iowa Department of Justice, files this Statement of Position in the above-captioned rulemaking proceeding. On July 22, 2016, the Iowa Utilities Board (“Board”) commenced this rulemaking proceeding to update the interconnection requirements for electric customers with distributed generation facilities. On September 6, 2016, OCA and other parties submitted comments on the proposed rule changes. On October 18, 2016, the Board issued an Order Requesting Additional Comments, specifically requesting comments on proposals made by Interstate Power and Light Company (“IPL”). OCA hereby submits the following comments regarding IPL’s proposed modifications to Chapter 45.

2. IPL proposed the addition of language regarding an affected system study to the interconnection requirements of rule 45.11(6) “a.” While OCA understands the rationale for considering impacts to non-utility owned systems, such as transmission systems, OCA has concerns that the proposed additions have the potential to increase customer costs and impose additional barriers to customer use of distributed generation. In particular, OCA is concerned that it is unclear who would make the determination that an affected system study is necessary or what criteria would cause an affected system study to be necessary and that without more

specific details, customers may have unnecessary burdens and expenses placed on their ability to interconnect.

3. OCA objects to IPL's recommendation to include the applicant's ownership interest (owner, lease, 3rd party PPA, or other) on the interconnection application. That information is irrelevant to the interconnection agreement and provides no useful information to the utility.

OCA appreciates the opportunity to provide comments addressing the proposed rule amendments in chapter 45 and will update its position as appropriate based on comments submitted by other parties pursuant to the schedule in the Board's Order of October 18, 2016.

Respectfully submitted,

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